

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP, and  
TAIWAN SCOTT, on behalf of himself and all  
other similarly situated persons,

House Defendants,

vs.

THOMAS C. ALEXANDER, in his official  
capacity as President of the Senate; LUKE A.  
RANKIN, in his official capacity as Chairman  
of the Senate Judiciary Committee; JAMES H.  
LUCAS, in his official capacity as Speaker of  
the House of Representatives; CHRIS  
MURPHY, in his official capacity as Chairman  
of the House of Representatives Judiciary  
Committee; WALLACE H. JORDAN, in his  
official capacity as Chairman of the House of  
Representatives Elections Law Subcommittee;  
HOWARD KNAPP, in his official capacity as  
interim Executive Director of the South  
Carolina State Election Commission; JOHN  
WELLS, Chair, JOANNE DAY, CLIFFORD  
J. ELDER, LINDA MCCALL, and SCOTT  
MOSELEY, in their official capacities as  
members of the South Carolina State Election  
Commission,

Defendants.

Case No. 3:21-cv-03302-MBS-TJH-RMG

**HOUSE DEFENDANTS JAMES H.  
LUCAS, CHRIS MURPHY, AND  
WALLACE H. JORDAN'S EXHIBIT  
LIST**

HOUSE DEFENDANTS' EXHIBIT LIST  
SC NAACP v. Alexander, et al.

<b><u>Exhibit #</u></b>	<b><u>Description</u></b>	<b><u>Beginning Bates #</u></b>
1	Expert Report of Sean P. Trende, J.D., M.A.S.	
2	Expert Rebuttal Report of Sean P. Trende, J.D., M.A.S.	
3	Curriculum Vitae of Sean P. Trende, J.D., M.A.S.	
4	Expert Report of Thomas L. Brunell, Ph.D.	
5	Expert Rebuttal Report of Thomas L. Brunell, Ph.D.	
6	Curriculum Vitae of Thomas L. Brunell, Ph.D.	
7	Expert Report of J. David Woodard, Ph.D.	
8	Curriculum Vitae of J. David Woodard, Ph.D.	
9	*Transcript of February 10, 2022 Deposition of Joseph M. Bagley, Ph.D., inclusive of all relevant and admissible portions and exhibits	
10	*Transcript of February 9, 2022 Deposition of Moon Duchin, Ph.D., inclusive of all relevant and admissible portions and exhibits	
11	*Transcript of February 10, 2022 Deposition of Kosuke Imai, Ph.D., inclusive of all relevant and admissible portions and exhibits	
12	*Transcript of February 14, 2022 Deposition of Baodong Liu, Ph.D., inclusive of all relevant and admissible portions and exhibits	
13	*Transcript of February 10, 2022 Deposition of Jordan M. Ragusa, Ph.D., inclusive of all relevant and admissible portions and exhibits	
14	*Transcript of April 1, 2022 Deposition of Representative Wendy Brawley, inclusive of all relevant and admissible portions and exhibits	
15	*Transcript of April 12, 2022 Deposition of John C. Ruoff, Ph.D., inclusive of all relevant and admissible portions and exhibits	
16	Transcript of February 4, 2022 Deposition of Brenda Murphy, inclusive of all relevant and admissible portions and exhibits	
17	Transcript of Continued Deposition of Brenda Murphy on April 14, 2022, inclusive of all relevant and admissible portions and exhibits	
18	*Transcript of April 14, 2022 SC NAACP 30(b)(6) Deposition of Brenda Murphy, inclusive of all relevant and admissible portions and exhibits	
19	SC NAACP Reapportionment Committee Meeting-July 19 Agenda	

## HOUSE DEFENDANTS' EXHIBIT LIST

SC NAACP v. Alexander, et al.

20	*SC NAACP Reapportionment Committee Meeting-June 21 Minutes	
21	*SC NAACP Reapportionment Committee Meeting-July 26 Agenda	
22	*SC NAACP Reapportionment Committee Meeting-August 5 Agenda	
23	*SC NAACP Reapportionment Committee Meeting-July 26 Minutes	
24	*SC NAACP Reapportionment Committee Meeting-July 26 Minutes	
25	*SC NAACP Reapportionment Committee Meeting-July 26 Minutes	
26	*SC NAACP Reapportionment Committee Meeting-August 12 Agenda	
27	*SC NAACP Reapportionment Committee Meeting-August 26 Agenda	
28	*SC NAACP Reapportionment Committee Meeting-September 2 Agenda	
29	*SC NAACP Reapportionment Committee Meeting-September 16 Agenda	
30	*SC NAACP Reapportionment Committee Meeting-September 23 Agenda	
31	*SC NAACP Reapportionment Committee Meeting-September 30 Agenda	
32	*SC NAACP Reapportionment Committee Meeting-October 7 Agenda	
33	*SC NAACP Reapportionment Committee Meeting-October 21 Agenda	
34	*SC NAACP Reapportionment Committee Meeting-July 23 Minutes	
35	*SC NAACP Reapportionment Committee Meeting-June 26 Minutes	
36	*SC NAACP Reapportionment Committee Meeting-September 16 Agenda	
37	*SC NAACP Reapportionment Committee Meeting-July 19 Agenda	
38	*SC NAACP Reapportionment Committee Meeting-June 21 Minutes	
39	*SC NAACP Reapportionment Committee Meeting-July 26 Agenda	
40	*SC NAACP Reapportionment Committee Meeting-July 19 Minutes	
41	*SC NAACP Reapportionment Committee Meeting-July 26 Minutes	

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SC NAACP v. Alexander, et al.

42	*SC NAACP Reapportionment Committee Meeting-September 30 Agenda	
43	*SC NAACP Reapportionment Committee Meeting-July 26 Minutes	
44	*SC NAACP Reapportionment Committee Meeting-August 19 Agenda	
45	*SC NAACP Reapportionment Committee Meeting-October 21 Agenda	
46	*SC NAACP Reapportionment Committee Meeting-August 12 Agenda	
47	*SC NAACP Reapportionment Committee Meeting-June 26 Minutes	
48	*SC NAACP Reapportionment Committee Meeting-July 23 Minutes	SCLWV_SUB_0027383
49	*SC NAACP Reapportionment Committee Meeting-August 26 Agenda	SCLWV_SUB_0029602
50	*SC NAACP Reapportionment Committee Meeting-October 7 Agenda	SCLWV_SUB_0027154
51	*SC NAACP Reapportionment Committee Meeting-September 2 Agenda	SCLWV_SUB_0044119
52	*SC NAACP Reapportionment Committee Meeting-September 23 Agenda	SCLWV_SUB_0003637
53	*SC NAACP Reapportionment Committee Meeting-January 26 Agenda	SCLWV_SUB_0027403
54	*SC NAACP Reapportionment Committee Meeting-February 8 Agenda	SCLWV_SUB_0027740
55	*SC NAACP Reapportionment Committee Meeting-February 15 Minutes	SCLWV_SUB_0029556
56	*SC NAACP Reapportionment Committee Meeting-February 8 Minutes	SCLWV_SUB_0029558
57	*SC NAACP Reapportionment Committee Meeting-February 8 Minutes	SCLWV_SUB_0028544
58	*SC NAACP Reapportionment Committee Meeting-March 15 Agenda	SCLWV_SUB_0029637
59	*SC NAACP Reapportionment Committee Meeting-February 22 Minutes	SCLWV_SUB_0043892
60	*SC NAACP Reapportionment Committee Meeting-March 15 Agenda	SCLWV_SUB_0029503
61	*SC NAACP Reapportionment Committee Meeting-February 22 Minutes	SCLWV_SUB_0027728
62	*SC NAACP Reapportionment Committee Meeting-February 8 Minutes	SCLWV_SUB_0002892
63	*SC NAACP Reapportionment Committee Meeting-April 19 Minutes	SCLWV_SUB_0002093

## HOUSE DEFENDANTS' EXHIBIT LIST

SC NAACP v. Alexander, et al.

64	*SC NAACP Reapportionment Committee Meeting-April 19 Minutes	
65	*SC NAACP Reapportionment Committee Meeting Video	
66	*SC NAACP Reapportionment Committee Meeting Video	
67	*SC NAACP Reapportionment Committee Meeting Video	
68	*SC NAACP Reapportionment Committee Meeting Video	
69	*SC NAACP Reapportionment Committee Meeting Video	
70	*SC NAACP Reapportionment Committee Meeting Video	
71	*SC NAACP Reapportionment Committee Meeting Video	
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89	*SC NAACP Reapportionment Committee Meeting Video	
90	*SC NAACP Reapportionment Committee Meeting Video	
91	*SC NAACP Reapportionment Committee Meeting Video	SCNAACP_000089
92	*SC NAACP Reapportionment Committee Meeting Video	SCNAACP_000090
93	*SC NAACP Reapportionment Committee Meeting Video	SCNAACP_000094
94	*SC NAACP Reapportionment Committee Meeting Video	SCNAACP_000095
95	*SC NAACP Reapportionment Committee Meeting Video	SCNAACP_000098
96	*Transcript of April 4, 2022 Deposition of Steve Love, inclusive of all relevant and admissible portions and exhibits	SCNAACP_000099
97	*Transcript of April 4, 2022 Deposition of Charles Boykin, Esquire, inclusive of all relevant and admissible portions and exhibits	SCNAACP_000121
98	Proposed Statewide Map - NAACP	SCNAACP_000297
99	Re_ Exemplary Senate Plan 15.pdf	SCNAACP_000397
100	Re_ Block equivalency file for Sept 30 congressional plan.pdf	SCNAACP_000400

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101	Re_ P&C op ed draft 17.pdf	SCNAACP_000404
102	Accepted_ redistricting chit chat.pdf	SCNAACP_000408
103	chart.pdf	SCNAACP_000967
104	Re_ RPV in SC.pdf	SCNAACP_000997
105	Re_ redistricting map data request 4.pdf	SCNAACP_001039
106	Re_ Draft House Plan 1.pdf	SCNAACP_001043
107	the senate.pdf	SCNAACP_001047
108	Re_ the first fight over redistricting.pdf	SCNAACP_001456
109	Re_ draft testimony for Wednesday 2.pdf	SCNAACP_001457
110	Re_ question about house maps.pdf	SCNAACP_001463
111	Incumbent addresses.pdf	SCNAACP_001464
112	Re_ The House Congressional Alternative 1.pdf	SCNAACP_001469
113	The amended complaint.pdf	SCNAACP_001655
114	Re_ LTE draft 1.pdf	SCNAACP_001729
115	Draft House Plan.pdf	SCNAACP_001754
116	Thoughts -- Redistricting Committee Meeting Today.pdf	SCNAACP_001755
117	RE_ Procedure on the Congressional plan.pdf	SCNAACP_001756
118	Re_ [External] 2014 Election Data. 3pdf.pdf	SCNAACP_001757
119	NAACP Reapportionment meeting 2.pdf	SCNAACP_001758
120	RE_ Thoughts -- Redistricting Committee Meeting Today.pdf	SCNAACP_001759
121	Re_ Congress.pdf	SCNAACP_001760
122	Re_ Messaging and Redistricting_ Confidential Thoughts 1.pdf	SCNAACP_001761
123	FW_ ECF Notification for Matter_ 0841-009 RE_ 21-cv-03302 - SC NAACP v McMaster.pdf	SCNAACP_001762
124	redistricting litigation.pdf	SCNAACP_001763
125	RE_ Your time.pdf	SCNAACP_001764
126	Our Congressional Plan.pdf	SCNAACP_001765
127	FW_ Supplemental Comments on the House Judiciary Committee's Proposed House Redistricting Plan.pdf	SCNAACP_001766
128	Re_ RPV in SC -2014 General 5.pdf	SCNAACP_001767
129	NAACP redistricting.pdf	SCNAACP_001768
130	Re_ NAACP.pdf	SCNAACP_001769
131	Re_ ACLU redistricting work.pdf	SCNAACP_001770
132	Re_ House Plan and issues.pdf	SCNAACP_001771
133	Re_ redistricting litigation 7.pdf	SCNAACP_001772
134	House Plan and issues.pdf	SCNAACP_001773
135	Re_ draft testimony for Wednesday 1.pdf	SCNAACP_001774
136	Re_ Quick query - House 2.pdf	SCNAACP_001775
137	Re_ For a story related to redistricting.pdf	SCNAACP_001776

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138	Re_ two questions 4.pdf	SCNAACP_001777
139	your thoughts on ACLU_ 1.pdf	SCNAACP_001778
140	Two important things on redistricting.pdf	SCNAACP_001779
141	Re_ Fw_ LCC redistricting in SC.pdf	SCNAACP_001780
142	Re_ Draft House Plan 4.pdf	SCNAACP_001781
143	Re_ FW_ Map by Map, G.O.P.pdf	SCNAACP_001782
144	Re_ Invitation to Speak at LWV Good Governance Symposium.pdf	SCNAACP_001783
145	Re_ Candidates list 1.pdf	SCNAACP_001784
146	Re_ Quick Inquiry .pdf	
147	Re_ Revised House written testimony for review ASAP 1.pdf	
148	Re_ Your bio.pdf	
149	Re_ Revised House written testimony for review ASAP.pdf	
150	redistricting outreach.pdf	
151	Re_ RPV results.pdf	
152	Re_ RPV in SC - 2018 General 1.pdf	
153	Re_ RPV in SC - 2018 General 5.pdf	
154	Fwd_ Fw_ LCC redistricting in SC.pdf	
155	your thoughts on ACLU_.pdf	
156	Re_ SC House Criteria and hearing plans 3.pdf	
157	Re_ zoom with John Cusick and others from LDF 1.pdf	
158	Re_ NAACP meeting comments.pdf	
159	Re_ redistricting.pdf	
160	Re_ House Plan and issues 3.pdf	
161	Re_ preguntas.pdf	
162	Re_ My notes on House Draft Plan.pdf	
163	Re_ NAACP Reapportionment Committee meeting.pdf	
164	SC House Criteria and hearing plans.pdf	
165	Re_ Today 2.pdf	
166	Re_ Recap from end of SC House hearing.pdf	
167	Re_ Schedule for State Convention 1.pdf	
168	House amendments.pdf	
169	Re_ SC Redistricting- VRA Claim 3.pdf	
170	Leah Aden LDF.pdf	
171	Re_ Draft House Plan 3.pdf	SCLWV_SUB_0027284
172	Re_ Your maps.pdf	SCLWV_SUB_0027295
173	House redistricting process.pdf	SCLWV_SUB_0027302
174	Re_ House Judiciary Map is posted 1.pdf	SCLWV_SUB_0027306
175	Phone call from Reggie Lloyd.pdf	SCLWV_SUB_0027314
176	Re_ Some important questions today for all of you.pdf	SCLWV_SUB_0027316



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177	confirmation on Clyburn -- in case you ever want to drop by his place.pdf	SCLWV_SUB_0027321
178	the first fight over redistricting.pdf	SCLWV_SUB_0027328
179	Re_ Population Data 1.pdf	SCLWV_SUB_0027330
180	Re_ VR file.pdf	SCLWV_SUB_0027331
181	Re_ FW_ SC House Maps are out.pdf	SCLWV_SUB_0027337
182	NAACP calls - Confidential.pdf	SCLWV_SUB_0027350
183	ACLU redistricting work.pdf	SCLWV_SUB_0027371
184	Minutes from the January 7th Reapportionment Meeting.docx	SCLWV_SUB_0027409
185	Draft For 4 10 2021 Meeting President Murphys.pdf	SCLWV_SUB_0027419
186	Reapportionment Committee April 17 2021 Meeting.docx	SCLWV_SUB_0027420
187	Re: Documents for Distribution (From the Desk of President Murphy)	SCLWV_SUB_0027445
188	LDF Public Comment Training with NAACP Branch Members	SCLWV_SUB_0027453
189	LDF Public Comment Training with NAACP Branch Members Attachment	SCLWV_SUB_0027458
190	Letter to SC House Redistricting Ad Hoc Committee_08.09.2021_final.pdf	SCLWV_SUB_0027469
191	Letter to H Redistricting Ad Hoc Comm - Submitting Congressional and House Maps (10-8-21).pdf	SCLWV_SUB_0027473
192	Appendices 1-3 - Previous Correspondence and Proposed Maps.pdf	SCLWV_SUB_0027483
193	Supplemental Comments on Committee's Proposed House Redistricting Plan	SCLWV_SUB_0027494
194	Supplemental Comments on House 2021 Working Draft Plan (11-15-21).pdf	SCLWV_SUB_0027500
195	WheelerAmendment(Adopted).pdf	SCLWV_SUB_0027508
196	KingAmendment - York(Adopted).pdf	SCLWV_SUB_0027512
197	BambergAmendment(Adopted).pdf	SCLWV_SUB_0027590
198	KingAmendment - Govan(Tabled).pdf	SCLWV_SUB_0027596
199	McKnightAmendment(Adopted).pdf	SCLWV_SUB_0027601
200	BernsteinAmendment(Adopted).pdf	SCLWV_SUB_0027610
201	JordanAmendment(Adopted).pdf	SCLWV_SUB_0027612
202	KingAmendment - Guidelines(Tabled).pdf	SCLWV_SUB_0027620
203	2021 Redistricting Guidelines.pdf	SCLWV_SUB_0027638
204	FullCommitteeReport - StatewideMap.pdf	SCLWV_SUB_0027640
205	FullCommitteeReport - DetailedMap.pdf	SCLWV_SUB_0027649
206	FullCommitteeReport - BlockEq.xlsx	SCLWV_SUB_0027654
207	FullCommitteeReport - Core Constituencies.pdf	SCLWV_SUB_0027665
208	FullCommitteeReport - Plan Components.pdf	SCLWV_SUB_0027673



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209	FullCommitteeReport - Political Subdivison Splits Between Districts.pdf	SCLWV_SUB_0027682
210	FullCommitteeReport - Population Summary.pdf	SCLWV_SUB_0027695
211	FullCommitteeReport - Voting Age Population Summary.pdf	SCLWV_SUB_0027772
212	FullCommitteeReport - Demographics.xlsx	SCLWV_SUB_0027773
213	Core Constituencies.pdf	SCLWV_SUB_0027786
214	Political Subdivision Splits Between Districts.pdf	SCLWV_SUB_0027792
215	Population Summary Pop.pdf	SCLWV_SUB_0027798
216	Population Summary VAP.pdf	SCLWV_SUB_0027803
217	Staff Subcommittee Plan Stats.pdf	SCLWV_SUB_0027822
218	Partisan Analysis.pdf	SCLWV_SUB_0027848
219	Staff Subcommittee Plan.xlsx	SCLWV_SUB_0027860
220	FloorPassedDemographics.xlsx	SCLWV_SUB_0027886
221	FloorPassedCoreConstituencies.pdf	SCLWV_SUB_0027935
222	FloorPassedPopulationSummary.pdf	SCLWV_SUB_0027956
223	FloorPassedVotingAgePopulationSummary.pdf	SCLWV_SUB_0027965
224	FloorPassedStatewideMap.pdf	SCLWV_SUB_0028070
225	FloorPassedDetailedMap.pdf	SCLWV_SUB_0028121
226	FloorPassedBlockEq.xlsx	SCLWV_SUB_0028174
227	FloorPassedPoliticalSubdivisonSplitsBetweenDistricts.pdf	SCLWV_SUB_0028311
228	FloorPassedPlanComponents.pdf	SCLWV_SUB_0028332
229	StateHouseDistrictsPredraw.xlsx	SCLWV_SUB_0028336
230	2011 House Reapportionment Plan as Passed by the House	SCLWV_SUB_0028340
231	2011 House Reapportionment Plan as Passed by the House (District Maps)	SCLWV_SUB_0028341
232	2002 House Court-Drawn Reapportionment Plan	SCLWV_SUB_0028343
233	PLACEHOLDER- Any and all documents produced after the April 26, 2022 status conference, including documents requested of ACLU and LDF by subpoena.	

**\* = House Defendants will offer if the need arises**

House Defendants reserve the right to identify additional exhibits, including exhibits for materials that were not timely produced (including all documents produced after the April 26 status conference). House Defendants further reserve the right to identify additional exhibits for impeachment purposes and to use any exhibits offered and admitted on Plaintiffs' Exhibit Lists. House Defendants also reserve the right to create additional demonstrative exhibits.